

John E. Harvey : NO. 26,670 EQUITY
1205 East Street
Frederick, Maryland

PLAINTIFF : IN THE CIRCUIT COURT

VS.

Donald W. Clem and :
Charlotte Y. Clem, his wife : FOR
8213 Burnley Road
Towson, Maryland :

and :
FREDERICK COUNTY, MARYLAND

Kathleen K. Martz :
22 Fulton Avenue
Walkersville, Maryland :

And :

L. Samuel Martz :
7006 Goodluck Road
Lanham, Maryland :

and :

The Mayor and Board of :
Alderman of the City of
Frederick, Frederick :
County, Maryland :

DEFENDANTS :

: : : : : : : : :

ANSWER TO BILL OF COMPLAINT

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Answer of Donald W. Clem and Charlotte Y. Clem,
his wife, Defendants, to the Bill of Complaint filed against
them, by their Attorney, Murray H. Fout, respectfully represents
unto your Honorable Court:

FIRST: That the Defendants neither admit nor deny
the allegations contained in the Paragraphs 1, 2, 3 and 4 of
said Bill of Complaint. Said Defendants having no knowledge of
same, but demand full proof thereof.